

July 15, 2021

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Hon. Gabriel W. Gorenstein
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSEMENT

Re: Platt v. Commissioner of Social Security
Civil Action No: 1:20-cv-08382-GBD-GWG

Dear Judge Gorenstein:

This letter respectfully requests an extension of time of sixty-one (61) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on July 21, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion.

Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **September 20, 2021**. Subsequently, in accordance with the pattern of the Standing Order, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due **November 19, 2021**. Plaintiff's Reply would then be due **December 10, 2021** and Defendant's reply with respect to defendant's motion would be due **December 24, 2021**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.

Bar Code H06529

Counsel for Plaintiff

CC [via ECF]: Leslie Ramirez-Fisher (Counsel for Defendant)

SO ORDERED.

Dated: _____
New York, NY


Honorable Gabriel W. Gorenstein
U.S. Magistrate Judge

MEMORANDUM ENDORSEMENT

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Granted in part and denied in part. This case appears on the March 2022 report under the Civil Justice Reform Act. In order to allow sufficient time to prepare a Report and Recommendation, to allow time for the parties to prepare objections, and to allow a period for review by the district judge, briefing must be completed by the end of November. Accordingly, an extension only of 30 days can be granted. Plaintiff's motion for judgment on the pleadings is due August 20, 2021. The defendant's response to the motion and any cross motion is due October 19, 2021. Plaintiff's reply is due November 10, 2021 and the defendant's reply with respect to defendant's motion is due November 24, 2021. No further extensions will be granted to any party.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge
July 15, 2021